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April 16, 2015

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stanley G. Silva, Jr.
SGS Recycling Enterprises, Inc.
P.O. Box 955
Castroville, CA 95012

Richard Manner
Registered Agent for SGS Recycling Enterprises
11340 Commercial Parkway
Castroville, CA 95012

Jeff Vazzolo
A&S Metals
11340 Commercial Parkway
Castroville, CA 95012

Re: Notice of Clean Water Act Violations and Intent to File Suit

Dear Sirs:

I am writing on behalf of Ecological Rights Foundation ("ERF") to give notice that ERF intends to file a civil action against A&S Metals and SGS Recycling Enterprises, Inc.; Stanley G. Silva, Jr., President of SGS Recycling Enterprises and Jeff Vazzolo, Safety Director for A&S Metals (hereinafter collectively "You," "Your" or "A&S") for Your violations of the Clean Water Act ("CWA") at the A&S Facility located in Castroville, California ("the A&S Metals Facility" or "the Facility").

On information and belief, SGS Recycling Enterprises, Inc. is the operator of the A&S Metals facility in Castroville, California. If and to the extent that A&S Metals or any other entity named similarly to "A&S Metals" remains a separate legal entity from SGS Recycling Enterprises, Inc., such entities are included within the definition of You," "Your" or "A&S" for purposes of this notice letter.

This notice concerns Your violations of the CWA at Your A&S facility located in Castroville, California. Your Notice of Intent filed with the State Water Resources Control Board indicates the address of this facility is 11340 Commercial Parkway, Castroville, California ("the Facility") This letter addresses Your violations of the substantive and procedural requirements of the CWA and National Pollution Discharge Elimination System ("NPDES") General Permit No. CAS000001 [California State Water Resources Control Board] Water Quality Order No. 97-03-DWQ ("Industrial Stormwater Permit"). This letter further addresses Your violations of the predecessor version of the Industrial Stormwater Permit Issued by the California State Water Resources Control Board ("State Board") by Water Quality Order No. 91-013-DWQ (as amended by Order No. 92-116) in 1991/1992 and Your foreseeable violations of the version of Industrial Stormwater Permit issued on April 1, 2014 by State Board Water Quality Order No. 2014-0057-DWQ. All three of these versions of NPDES Permit No. CAS000001 had/have essentially the same terms and conditions. All references in this letter to sections of the version of NPDES Permit No. CAS000001 adopted by Water Quality Order No. 97-03-DWQ should be construed as equally referring to comparable sections in the State Board's orders adopting the 1992 and 2014 versions of this permit.[1]

CWA section 505(b) requires that sixty (60) days prior to the initiation of a civil action under CWA section 505(a), 33 U.S.C. § 1365(a), a citizen must give notice of his or her intent to file suit. Notice must be given to the alleged violator, the U.S. Environmental Protection Agency, and the State in which the violations occur.

As required by the CWA, this Notice of Violation and Intent to File Suit provides notice of the violations that have occurred and which are continuing to occur at the A&S Facility. ERF's investigations have uncovered significant violations of the Industrial Stormwater Permit and the CWA at the Facility. Consequently, You are hereby placed on formal notice from ERF that, after the expiration of sixty (60) days from the date of this Notice of Violation and Intent To File Suit, ERF intends to file suit in federal court against You under CWA section 505(a), 33 U.S.C. §1365(a), for CWA violations. These violations of the Industrial Stormwater Permit and

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[1] The version of NPDES Permit No. CAS000001 adopted by Water Quality Order No. 2014-0057-DWQ becomes effective July 1, 2015 and supersedes the version of this permit adopted by Water Quality Order No. 97-03-DWQ "except for Order 97-03-DWQ's requirement to submit annual reports by July 1, 2015 and except for enforcement purposes." Water Quality Order No. 2014-0057-DWQ at 1 & § I.6 (Findings). Thus, all requirements imposed by Water Quality Order No. 97-03-DWQ will remain in full force and effect after July 1, 2015 for purposes of the citizen suit that ERF proposes to bring against You. However, the requirements imposed by Water Quality Order No. 2014-0057-DWQ will also come into effect after July 1, 2015 and Your future violations of such Order's imposition of NPDES permit terms essentially identical to those ordered by Water Quality Order No. 97-03-DWQ will also be enforceable in ERF's proposed citizen suit.

the CWA are described more fully below.

I. BACKGROUND

ERF is a non-profit public benefit corporation organized under the laws of California, with its main office in Garberville, California. ERF's purpose is to educate the public about environmental practices which cause harm to human health, the environment and other natural resources, and to seek redress from those harms through litigation or alternative dispute resolution. ERF represents citizens in protecting California's waterways from pollution, securing the multitude of benefits that flow from clean, vibrant waters: safe drinking water, abundant and diverse wildlife populations, healthy recreational opportunities, and economic prosperity from commercial fishing, tourism, and other commercial activities that depend on clean water. To further its goals, ERF actively seeks federal and state agency implementation of state and federal water quality laws, including the CWA, and as necessary, directly initiates enforcement actions on behalf of itself and its members. ERF's members use and enjoy the waters and species impacted by Your Facility for various recreational, educational, aesthetic and spiritual purposes. These waters include Tembladero Slough, Elkhorn Slough, and Monterey Bay, and these species include those that reside, breed, and forage in and around those waters.

Discharges of stormwater and non-stormwater from metal recycling facilities are of significant concern because the industrial activities associated with these sites make various pollutants particularly accessible to stormwater. Specifically, facilities such as A&S are engaged in the collecting, dismantling, and recycling of auto parts and other metals, which contain heavy metals, a wide range of toxic and hazardous materials, and other pollutants that can come into contact with stormwater. Facilities such as A&S are also engaged in demolition and concrete aggregate crushing activities, which contain additional pollutants that can come into contact with stormwater.

At Your Facility, vehicles, parts and scrap metal materials, and aggregate materials are mostly stored uncovered in the outdoor portion of the Facility, primarily in unpaved areas of the Facility. Stormwater comes into contact with these scrap vehicles and parts, scrap materials, aggregate materials, and the other pollutants at the Facility. The Facility lacks sufficient and/or sufficiently well-maintained berms or other structural controls to retain stormwater on the Facility. A&S does not sufficiently treat contaminated stormwater prior to discharge from the Facility. The large number of trucks and rolling stock entering and leaving the Facility track dirt, metals, and other pollutants off-site where rainfall washes these pollutants into the storm drain system or directly into waters of the United States.

II. THE LOCATION OF THE ALLEGED VIOLATIONS

The violations alleged in this notice letter have occurred and continue to occur at Your

Facility which Your Notice of Intent indicates as having its address at 11340 Commercial Parkway, Castroville, California. The Facility discharges contaminated stormwater through a series of drains, pipes and ditches into Tembladero Slough, which is tidally connected to Elkhorn Slough and Monterey Bay. A&S's Notice of Intent to be covered by the Industrial Stormwater Permit ("NOI") for the Facility identifies Tembladero Slough as the receiving water for its stormwater discharges. Tembladero Slough is a water of the United States. Violations of the substantive and procedural requirements of the Industrial Stormwater Permit and the CWA have occurred and continue to occur at the Facility.

A. A&S's Facility

You own and operate the A&S Facility, which is located at 11340 Commercial Parkway, Castroville, California. The Facility is located at the southeast end of Commercial Parkway, which runs in a U-shape off of Blackie Road, in the south end of Castroville in Monterey County.

On information and belief, You offer metal recycling, demolition, and concrete aggregate crushing services at this Facility. The Facility consists of a series of outbuildings and uncovered yards where ferrous and non-ferrous scrap metal, metal waste, plastic and paper household wastes, and used motor vehicle parts are sorted and stored. Scrap metals and other materials are stockpiled outside exposed to the elements, in large, uncontrolled piles. Numerous piles appear to contain shredded and rusting metals. Information available to ERF indicates that metal particulates, oil, grease and other fluids from automobiles, and other pollutants from the full range of recycling activities are tracked from the Facility onto the adjacent streets.

In addition to metal scrap, automobile, and household waste recycling activities, the Facility recycles used concrete and asphalt from construction demolition. On information and belief, the materials are crushed, sorted, and prepared for resale to aggregate wholesalers. These activities are a source of fine particulate matter and serve as an additional source for metal pollutant loading via tracking and airborne deposition. The crusher used in the aggregate recycling also is a source of non-storm water discharges since water is sprayed routinely on the aggregate piles for dust control. Non-stormwater discharges are tracked throughout the facility and onto public streets by the high level of vehicular traffic entering and exiting the Facility.

Stormwater sampling results obtained by ERF indicate that discharges of stormwater from the Facility are consistently contaminated with higher levels of pollutants than permissible under the Industrial Stormwater Permit and that You have therefore failed to develop and/or implement an adequate Stormwater Pollution Prevention Plan ("SWPPP"), Monitoring and Reporting Program ("MRP"), or best management practices ("BMPs") as required by the Industrial Stormwater Permit.

C. Affected Waters

Stormwater discharged from Your Facility flows into Tembladero Slough and then to Elkhorn Slough, and Monterey Bay. The CWA requires that water bodies like the Tembladero Slough, Elkhorn Slough, and Monterey Bay meet water quality objectives which protect specific "beneficial uses." The beneficial uses of the Tembladero Slough include marine habitat; preservation of rare, threatened, or endangered species; shellfish harvesting; water contact recreation; and non-contact water recreation.

Tembladero Slough is a tributary to the Old Salinas River and Elkhorn Slough. Tembladero Slough and the Old Salinas River serve an important biological function as they are a significant source of freshwater that contributes to the Elkhorn Slough Estuary, which by definition, is a mixture of terrestrial, freshwater and marine habitats. Tembladero Slough is on the 303(d) list of impaired waterbodies, it is listed as impaired for numerous criteria including sediment toxicity, "other" toxicity, and turbidity.

The Elkhorn Slough watershed is an incredibly rich biological area, with over 270 species of resident and migratory birds, and freshwater ponds and riparian wetland areas that support two dozen rare, threatened or endangered species, including peregrine falcons, Santa Cruz long-toed salamander, California red-legged frog, California tiger salamander clapper rails, brown pelicans, least terns and southern sea otters, among others. Elkhorn Slough is one of the few, relatively undisturbed coastal wetlands remaining in California. The main channel of the slough winds inland nearly seven miles and encompasses over 2,500 acres of marsh and tidal flats. Over 500 species of invertebrates, 100 species of fish, and 270 species of birds have been identified in Elkhorn Slough. The Slough's tributaries are nurseries for many fish, and the Slough is on the Pacific Flyway, providing an important feeding and resting ground for many kinds of migrating waterfowl and shorebirds. Various fish species, such as English Sole, top smelt, anchovies, sculpin, and leopard sharks use the Slough as a nursery, and fish can be vulnerable to contaminants from upstream sources. These are important forage fish for birds and other animals, so the impacts of contaminants You discharge are likely reverberating up the food web.

The California Regional Water Quality Control Board, Region 3's Central Coastal Basin Plan ("Basin Plan") seeks to protect and maintain aquatic ecosystems and the resources those systems provide to society. The Basin Plan acknowledges discharges of urban industrial site stormwater as a potential significant source of pollution adversely affecting the quality of local waters. Contaminated stormwater discharges from Your Facility adversely impact the water quality of the Tembladero Slough and threaten its vulnerable and important ecosystem.

Contaminated stormwater from metals recycling activities at Your Facility endangers the rare and endangered species and further degrades habitat for all species in the Slough and downstream receiving waters. Tembladero Slough sediments act as a sink for bioaccumulative deposits of heavy metals, and toxic chemicals are concentrated in the Slough's food web as toxic metals and other contaminants absorbed by benthic organisms are consumed farther up the food

chain, and eventually by humans who may fish downstream of the discharges. Contamination of the aquatic food chain disproportionately harms minority and poor communities, who typically eat a greater than average amount of fish.

Stormwater runoff from Your Facility contaminated with metals and other pollutants also harms the special aesthetic and recreational significance that the Tembladero Slough has for people in the surrounding communities. Non-contact recreational and aesthetic opportunities, such as wildlife observation in Tembladero Slough, the Old Salinas River, Elkhorn Slough, and Monterey Bay also are damaged by Your stormwater contaminants discharged to the Slough.

It is unlawful to discharge pollutants to waters of the United States, such as the Tembladero Slough, without an NPDES permit or in violation of the terms and conditions of an NPDES permit. On April 4, 2014, You submitted a Notice of Intent to be authorized to discharge stormwater from Your Facility by the Industrial Stormwater Permit. Thus, since that date, You have been a permittee subject to the Industrial Stormwater Permit's requirements. The Stormwater Industrial Permit is an NPDES permit, the current version of which the State Board issued on April 17, 1997. Other than coverage under the Industrial Stormwater Permit, Your Facility lacks NPDES permit authorization for any wastewater discharges.

As discussed below, ERF's investigations have uncovered numerous significant violations of the Industrial Stormwater Permit and of the CWA's prohibition on the discharge of pollutants to waters of the United States not in compliance with an NPDES permit. Consequently, You are hereby placed on formal notice from ERF that, after the expiration of sixty (60) days from the date of this Notice of Violation and Intent To File Suit, ERF intends to file suit in federal court against You under CWA section 505(a), 33 U.S.C. § 1365(a), for violations of the CWA.

III. THE ACTIVITIES AT THE FACILITY ALLEGED TO CONSTITUTE VIOLATIONS AND THE EFFLUENT LIMITATIONS VIOLATED

Numerous pollutant-generating activities at Your Facility occur outdoors in uncovered areas exposed to rainfall and stormwater runoff. As a result, contaminated stormwater runs off the Facility from the discharge point identified in Your Annual Report and discharges to Tembladero Slough. Pursuant to the Industrial Stormwater Permit, this contaminated stormwater discharge obligates A&S to develop, implement, and update and revise a SWPPP which minimizes the discharge of pollutants to a level commensurate with application of the Best Available Technology Economically Achievable (BAT) and the Best Conventional Pollutant Control Technology (BCT). In addition, the SWPPP and Your implementation of the SWPPP must prevent Your discharges from causing or contributing to violations of Water Quality Standards for Tembladero Slough. You must also monitor and sample Your Facility's stormwater discharges, and meet various other limitations on its stormwater discharge.

As further described below, You have failed to develop, implement, and revise an adequate SWPPP. You have discharged stormwater polluted to levels exceeding BAT and BCT levels of control and which have caused violations of Water Quality Standards. You further have failed to adequately monitor and sample Your stormwater discharges and meet various other limitations on Your stormwater discharge in the Industrial Stormwater Permit. These actions all constitute actionable CWA violation.

As a result of the numerous pollutant-generating activities at Your Facility, contaminated stormwater runs off Your Facility and discharges into Tembladero Slough. Information available to ERF indicates that You have failed to comply with all requirements of the Industrial Stormwater Permit. As further described below, these actions constitute violations of the CWA.

A. Discharges in Violation of the Industrial Stormwater Permit

The CWA provides that "the discharge of any pollutant by any person shall be unlawful" unless the discharger is in compliance with the terms of a NPDES permit. CWA § 301(a), 33 U.S.C. § 1311(a); *see also* CWA § 402(p), 33 U.S.C. § 1342(p) (requiring NPDES permit issuance for the discharge of stormwater associated with industrial activities). The Facility discharges stormwater associated with industrial activity to the Tembladero Slough which is contaminated with pollutants. The Facility discharges stormwater pursuant to the Industrial Stormwater Permit, which authorizes these discharges conditioned on the Facility complying with the terms of the Industrial Stormwater Permit. Each of these permit terms constitutes an "effluent limitation" within the meaning of CWA section 505(f), 33 U.S.C. § 1365(f). The Facility's stormwater discharges have violated numerous of these permit terms, thereby violating CWA effluent limitations.

1. Discharges in Excess of BAT/BCT Levels

The Effluent Limitations of the Industrial Stormwater Permit, § B.3, prohibit Your Facility from discharging pollutants above the level commensurate with the application of BAT and BCT. EPA and the State Board have published Benchmark Values set at the maximum level of pollutant loading generally expected if an industrial facility is employing BAT and BCT,[2] (which are set forth in Attachment 1 to this Notice Letter). As reflected in Attachment 1 this Notice Letter, the Facility has repeatedly discharged stormwater containing pollutant levels exceeding Benchmark Values, which establishes that the Facility has discharged pollutants above a level commensurate with application of BAT and BCT.[3]

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[2] These Benchmark Values are reproduced on the State Board's website at: http://www.swrcb.ca.gov/water_issues/programs/stormwater/docs/smanlrdc.pdf (note: State Board Benchmark Values are set forth in this State Board document as Table A and EPA Benchmark Values are set forth in this State Board document as Attachment 3, Table B).

[3] This provision of the Industrial Stormwater Permit remains the same in the version

Attachment 1 reflects samples taken by ERF from Your Facility. The sample results reflected in Attachment 1 is representative of the pollutant levels in the Facility's discharge of stormwater, including such discharges that You did not sample or analyze. Thus, every instance when the Facility has discharged stormwater, including instances when the Facility has discharged stormwater that it has not sampled, this stormwater discharge has contained levels of pollutants comparable to the levels set forth in Attachment 1.

ERF alleges and puts You on notice that each day that You discharged stormwater from the Facility, Your stormwater contained levels of pollutants similar to the levels reported in Attachment 1, thus exceeding Benchmark Values.

ERF representatives observed discharges of stormwater from Your Facility on December 11, 2014. On that day, ERF representatives observed stormwater discharging from the retention basin in the aggregate processing area. ERF representative observed turbid water widely dispersing from the retention pond and entering the drainage ditch that discharges into Tembladero Slough. There did not appear to be any treatment or pollution reduction controls applied to the stormwater prior to discharge. ERF also observed a lack of Best Management Practices (BMPs) designed to reduce pollutant loading and keep particulate matter created by the metal recycling and aggregate recycling activities from being tracked around the facility and onto public streets. Thus, the lack of any treatment controls and turbidity in Your stormwater discharges further establishes that You have discharged and are continuing to discharge stormwater that is not treated to a level commensurate with application of BAT and BCT. ERF alleges that the stormwater discharges ERF observed on this day is representative of Your stormwater discharges generally and thus every day You have discharged stormwater, You have failed to employ BAT and BCT treatment.

While You should be aware of each day that You have discharged stormwater from the Facility (as the Industrial Stormwater Permit requires You to monitor such discharges), ERF alleges and puts You on notice that since You began industrial operations at the Facility, You have discharged stormwater containing pollutants from the Facility to the Tembladero Slough during at least every significant local rain event over 0.1 inches. Significant local rain events are reflected in the rain gauge data available at http://lwf.ncdc.noaa.gov/oa/ncdc.html. Attached as Attachment 2 is a table reflecting the rainfall data for the past five years, as reported to the Castroville Station, the closest monitoring station available on the NOAA website.

ERF further alleges that on each day that You have discharged stormwater You have

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effective as of July 1, 2015 ("2015 Permit"). *See* 2015 Permit § V.A. ERF hereby places you on notice that ERF intends to bring claims against you for violations of this provision in the July 1, 2015 version of the Industrial Stormwater Permit to the extent that You continue Your present stormwater discharge practices in the future.

discharged stormwater that was not treated to a level commensurate with BAT or BCT in violation of the Effluent Limitations of the Industrial Stormwater Permit, § B.3., because, as further alleged in subsection 3, below, You have not developed and implemented a SWPPP that mandates BMPs that are commensurate with BAT and BCT for Your Facility.

ERF alleges that Your unlawful discharges of stormwater from the Facility with levels of pollutants exceeding BAT and BCT levels of control continue to occur presently during all significant rain events. Each discharge of stormwater from Your Facility after the effective date of the BAT and BCT requirements has constituted a separate violation of the Industrial Stormwater Permit and the CWA. You are subject to civil penalties for violations of the Industrial Stormwater Permit and the CWA within the past five (5) years.

Your continued discharges of stormwater containing levels of pollutants above Benchmark Values and BAT- and BCT-based levels of control necessarily means that You have not developed and/or implemented sufficient BMPs[4] at the Facility to prevent stormwater flows from coming into contact with the sources of contaminants at the Facility or otherwise to control the discharge of pollutants from the Facility. Accordingly, A&S has not developed and/or implemented adequate SWPPPs or MRPs at the Facility.

2. Discharges that Have Impaired Receiving Waters

The Discharge Prohibitions of the Industrial Stormwater Permit, ¶ A.2, prohibit stormwater discharges that cause or threaten to cause pollution, contamination, or nuisance. The Discharge Prohibitions of the Industrial Stormwater Permit, ¶ A.2, prohibit stormwater discharges to surface or groundwater that adversely impact human health or the environment. The Receiving Water Limitations of the Industrial Stormwater Permit, ¶ C.2, prohibit stormwater discharges that cause or contribute to an exceedance of applicable Water Quality Standards.[5] Applicable Water Quality Standards are set forth in the Basin

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[4] The July 1, 2015 version of the permit requires dischargers to implement a set of minimum BMPs. Implementation of the minimum BMPs, in combination with any advanced BMPs necessary to reduce or prevent pollutants in industrial stormwater discharges, serve as the basis for compliance with the permit's technology-based effluent limitations and water quality based receiving water limitations. *See* 2015 Permit § X.H.1 and 2.. ERF hereby places you on notice that ERF intends to bring claims against you for violations of this provision in the July 1, 2015 version of the Industrial Stormwater Permit to the extent that You continue Your present stormwater discharge practices in the future.

[5] The July 1, 2015 version of this permit contains essentially identical Discharge Prohibitions. *See* 2015 Permit § V. A-C. ERF hereby places you on notice that ERF intends to bring claims against you for violations of these provisions in the July 1, 2015 version of the Industrial Stormwater Permit to the extent that You continue Your present stormwater discharge practices in the future. In addition, the 2015 Permit requires a discharger to monitor additional parameters if the discharge(s) from its facility contributes pollutants to

Plan[6] and the California Toxics Rule[7] ("CTR").

The Basin Plan, *inter alia*, establishes the following Water Quality Standards for Tembladero Slough:

> 1. Controllable water quality shall conform to the water quality objectives contained therein. Basin Plan at III-2.
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> 2. Dissolved oxygen levels shall be a minimum of 5.0 mg/L [5,000 ug/L]. *Id.* at III-
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> 3. Suspended sediment shall not be discharged at rates that cause nuisance or adversely affect beneficial uses. *Id.* at III-3.
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> 4. Waters shall not contain settleable material in concentrations that result in deposition of material that causes nuisance or adversely affects beneficial uses. *Id.*
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> 5. Waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. *Id.*
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> 6. Waters shall not contain oils, greases, waxes, or other similar materials in concentrations that result in a visible film or coating on the surface of the water or on objects in the water, that cause nuisance, or that otherwise adversely affect beneficial uses. *Id.*

The Basin Plan further establishes numeric water quality criteria for cadmium, chromium, copper, lead, mercury, and nickel.

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receiving waters that are listed as impaired for those pollutants (CWA section 303(d) listings). *See* 2015 Permit § VI. A-C and VII.B. The receiving waters that are 303(d) listed as impaired for pollutants that are likely to be associated with industrial stormwater in Appendix 3. Elkhorn Slough is among the listed waters impaired for pH, Low Dissolved Oxygen, and Sediment. ERF hereby places you on notice that ERF intends to bring claims against you for violations of this provision in the July 1, 2015 version of the Industrial Stormwater Permit to the extent that You continue Your present stormwater discharge practices, including monitoring practices, in the future. These practices do not include the enhanced monitoring that will be required by the 2015 Permit.

[6] The Basin Plan is published by EPA on the internet at:
http://www.epa.gov/waterscience/standards/wqslibrary/ca/ca_9_san_francisco.pdf
The Basin Plan is also published by the Regional Board on the internet at:
http://www.swrcb.ca.gov/rwqcb2/basinplan.htm

[7] The CTR is set forth at 40 C.F.R. § 131.38 and is explained in the Federal Register preamble accompanying the CTR promulgation set forth at 65 Fed. Reg. 31682

ERF alleges and puts You on notice that Your discharges of stormwater from the Facility from Your Facility have caused or contributed to an exceedance of one or more of the above-listed Water Quality Standards. Attachment 1 to this Notice Letter compiles some of the data gathered by ERF's sampling of the Facility's stormwater discharges. The sample results reflected in Attachment 1 are representative of the pollutant levels in the Facility's discharge of stormwater, including such discharges that You did not sample or analyze. Thus, every instance when the Facility has discharged stormwater, including instances when the Facility has discharged stormwater that You have not sampled, this stormwater discharge has contained levels of pollutants comparable to the levels set forth in Attachment 1. Attachment 1 indicates that the Facility routinely discharges stormwater to Tembladero Slough containing, *inter alia*, the following pollutants: copper, iron, lead, mercury, nickel, arsenic, chromium, selenium, total suspended solids (TSS), Specific Conductance (EC), BOD, and COD. The levels of these pollutants in Your Facility's stormwater discharges have caused pollution, contamination, or nuisance in violation of the Discharge Prohibitions of the Industrial Stormwater Permit, ¶ A.2 and adversely impacted the environment in violation of the Receiving Water Limitations of the Industrial Stormwater Permit, ¶ C.1. Moreover, the discharge of these pollutants has caused the Tembladero Slough not to attain or contributed to these waters not attaining one or more applicable Water Quality Standards in violation of the Receiving Water Limitations of the Industrial Stormwater Permit, ¶ C.1.[8]

Specifically, Your Facility's discharge of excessive TSS has caused or contributed to Tembladero Slough not meeting applicable Water Quality Standards in the Basin Plan for levels of suspended sediment and turbidity. Your Facility's discharge of stormwater containing suspended and settleable toxic metals and other materials has contributed to the deposition and/or dispersal of materials that interfere with beneficial uses of Tembladero Slough and a detrimental increase in concentrations of toxic substances found in bottom sediments or aquatic life due to bioaccumulation. Your Facility's discharge of copper, lead, arsenic, chromium, iron, mercury, nickel and selenium have caused the Tembladero Slough to exceed Water Quality Criteria established by the CTR and Basin Plan for these pollutants. Your Facility's discharge of stormwater with high BOD/COD has contributed further to the failure of Tembladero Slough to meet standards for dissolved oxygen.

ERF alleges and puts You on notice that each day that You discharged stormwater from the Facility, Your stormwater contained levels of pollutants matching the levels set forth in Attachment 1 and thus caused levels of pollutants to exceed one or more of the applicable Water Quality Standards in the Tembladero Slough.[9] While You should be aware

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[8] The July 1, 2015 version of this permit contains Receiving Water Limitations. *See* 2015 Permit § VI.A-C and VII.B. ERF hereby places you on notice that ERF intends to bring claims against you for violations of these provisions in the July 1, 2015 version of the Industrial Stormwater Permit to the extent that You continue Your present stormwater discharge practices in the future.

[9] The version of permit effective July 1, 2015 contains two types of Numerical Action Level

of each day that You have discharged stormwater from the Facility (as the Industrial Stormwater Permit requires You to monitor such discharges), ERF alleges and puts You on notice that since the effective date of the above-referenced Water Quality Standards, which date back at least to 1986 in most instances and to May 24, 2000 for the California Toxics Rule's limit on copper and lead, You have discharged stormwater from the Facility during at least every significant local rain event over 0.1 inches that have caused or contributed to Water Quality Standards not being met in the Tembladero Slough. Significant local rain events are reflected in the rain gauge data available at http://lwf.ncdc.noaa.gov/oa/ncdc.html and, as mentioned above, summarized in Attachment 2.

As discussed above, ERF representatives observed discharges of stormwater from Your Facility on December 11 2014. Your stormwater discharges were very murky and thus visibly contained high levels of turbidity. Thus, Your stormwater discharges were causing Tembladero Slough waters to fail to meet the Basin Plan's narrative water quality standards mandating that "(1) Suspended sediment shall not be discharged at rates that cause nuisance or adversely affect beneficial uses, (2) Waters shall not contain settleable material in concentrations that result in deposition of material that causes nuisance or adversely affects beneficial uses, and (3) Waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses." Basin Plan III-3. ERF alleges that the stormwater discharges ERF observed on this day are representative of Your stormwater discharges generally and thus every day you have discharged stormwater, You have discharge stormwater that causes the Tembladero Slough to fail to meet these Basin Plan water quality standards.

Your unlawful discharges from the Facility continue to occur presently during all significant rain events. Each discharge from Your Facility that causes or contributes to an exceedance of an applicable Water Quality Standard constitutes a separate violation of the Industrial Stormwater Permit and the CWA. You are subject to penalties for violations of the Industrial Stormwater Permit and the CWA within the past five (5) years.

(NAL) exceedances: (1) an annual NAL and (2) an instantaneous maximum NAL. An annual NAL exceedance occurs when the average of all sampling results within a reporting year for a single parameter (except pH) exceeds the applicable annual NAL. An instantaneous maximum NAL exceedance occurs when two or more analytical results from samples taken for any parameter within a reporting year exceed the applicable instantaneous maximum NAL value. Instantaneous maximum NALs are only for Total Suspended Solids (TSS) and Oil and Grease (O&G). The 2015 Permit requires dischargers to develop and implement Exceedance Response Actions (ERAs), when an annual NAL or instantaneous maximum NAL exceedance occurs during a reporting year. *See* 2015 Permit § XI and XII. ERF hereby places you on notice that ERF intends to bring claims against you for violations of this provision in the July 1, 2015 version of the Industrial Stormwater Permit to the extent that You continue Your present stormwater discharge practices (which include discharges at levels above the NAL) and fail to adopt compliant ERAs.

3. Violation of Industrial Stormwater Permit Conditions Related to Development and/or Implementation of an Adequate Stormwater Pollution Prevention Plan ("SWPPP")

The Industrial Stormwater Permit, Section A: Stormwater Pollution Prevention Plan Requirements, ¶ 1 requires dischargers covered by the Industrial Stormwater Permit and commencing industrial activities before October 1, 1992 to develop and implement an adequate SWPPP by October 1, 1992. The Provisions of the Industrial Stormwater Permit, ¶ C.1 also requires dischargers to make all necessary revisions to existing SWPPPs promptly, and in any case no later than August 1, 1997.[10]

The SWPPP must include, among other requirements, the following:

1. Specification of BMPs designed to reduce pollutant discharge to BAT and BCT levels, including BMPs already existing and BMPs to be adopted or implemented in the future. Industrial Stormwater Permit at 17, Section A: Stormwater Pollution Plan Requirements, ¶ 8.

2. A site map showing the stormwater conveyance system and areas of actual and potential pollutant contact and all areas of on-going industrial activity. *Id.* at 12-13, Section A: SWPPP Requirements, ¶ 4.

3. Identification of the specific individual or individuals and their positions within the facilities organization as members of a stormwater pollution prevention team responsible for developing the SWPPP, assisting the facilities manager in SWPPP implementation and revision, and conducting all monitoring program activities required in the Industrial Stormwater Permit. The SWPPP must clearly identify the Industrial Stormwater Permit related responsibilities, duties, and activities of each team member. *Id.* at 12, Section A: SWPPP Requirements, ¶ 3.a.

4. A list of significant materials handled and stored at the site and a narrative assessment of "which pollutants are likely to be present in stormwater discharges" from the site. *Id.* at 14, 17; Section A, ¶ 5 and Section A, ¶ 7.a.ii.

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[10] The July 1, 2015 version of this permit contains essentially identical SWPP requirements, but with a new set of minimum BMPs and additional Advanced BMPs. *See* 2015 Permit § X.A-I. ERF hereby places you on notice that ERF intends to bring claims against you for violations of these provisions in the July 1, 2015 version of the Industrial Stormwater Permit to the extent that You continue Your present stormwater discharge practices in the future as Your present practices do not include BMPs commensurate with the 2015 Permit's requirements for minimum and advanced BMPs, *i.e.*, for BMPs that will address Your exceedances of NALs, prevent exceedances of water quality standards, and be commensurate with BAT/BCT.

5. Revisions to the SWPPP within 90 days after a facility manager determines that the SWPPP is in violation of any requirements of the Industrial Stormwater Permit. *Id.* at 23, Section A: SWPPP Requirements, ¶ 10.d.

On information and belief, You have failed to prepare, maintain, revise and implement Your SWPPP as required, as evidenced by stormwater discharges that exceed EPA and State benchmarks and contribute to violations of Water Quality Standards in receiving waters. Your SWPPP does not specify adequate BMPs designed to reduce pollutant discharge to BAT and BCT levels in accord with Section A: SWPPP Requirements, ¶ 8 of the Industrial Stormwater Permit as evidenced by the Facility's continued discharge of stormwater contaminated above pollutant levels attainable via application of BAT and BCT. For example all of the following BMP measures are technologically feasible, constitute BAT and BCT for Your Facility, and would greatly decrease Your discharges of contaminated stormwater: (1) paving process areas and berming the entire Facility, (2) building sufficient stormwater storage and adding treatment capacity to ensure that all stormwater is treated to a level that would meet EPA Benchmarks and not cause or contribute to exceedances of water quality standards, (3) regular sweeping of the Facility with a regenerative sweeper to prevent the buildup of metals and other pollutants, (4) semiannual power washing of the Facility to further prevent the buildup of metals and other pollutants (coupled with the collection and off-site disposal of power wash water), (5), constructing roof overhang structures or buildings and then conducting metals processing and vehicle maintenance only under cover and away from exposure to rainwater, (6) until such overhang structures or buildings are completed, (7) implement erosion control practices at the perimeter of your site and at any catch basins to prevent erosion of stockpiled materials off site, (8) halt the practice of fueling motor vehicles during rainstorm events, (9) to drain all automotive fluids out of stored vehicles, including transmission fluids and brake fluids, (10) not to drain automotive fluids out of stored vehicles during rain events, and (11) to place oil absorbent materials underneath stored automobiles that are sufficiently sized and sufficiently absorbent to prevent oil staining of the ground surrounding stored automobiles.[11]

Your failures to draft an adequate SWPPP, and/or to revise, and/or to implement Your SWPPP in all the above respects are in violation of the requirements of Section A of the Industrial Stormwater Permit. You were required to have prepared and implemented an

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[11] *See* SC-33, *Outdoor Storage of Raw Materials*, in the California Stormwater BMP Handbook, by the California Stormwater Quality Association, available at http://www.cabmphandbooks.com/Industrial.asp. This suggested protocol states in pertinent part: "Store all materials inside. If this is not feasible, then all outside storage areas should be covered with a roof and bermed or enclosed to prevent stormwater contact."

adequate SWPPP by no later than October 1, 1992 pursuant to the previous Industrial Stormwater Permit issued by the State Board and by Section A: Stormwater Pollution Prevention Plan Requirements, ¶ 1 of the current Industrial Stormwater Permit. Therefore, You have been in daily and continuous violation of the requirement to develop and implement an adequate SWPPP for the Facility on each and every day since October 1, 1992 that You have maintained the Facility. You will continue to be in violation every day that You fail to develop and implement an adequate SWPPP. You are subject to penalties for violations of the Industrial Stormwater Permit and the CWA occurring within the past five (5) years.

4. Failure to Develop and/or Implement an Adequate Monitoring and Reporting Program and Perform Annual Comprehensive Site Compliance Evaluations as Required by the Industrial Stormwater Permit.

The Industrial Stormwater Permit, Section B: Monitoring and Reporting Program (MRP) Requirements, ¶ 1, and Provisions, ¶ E.3, require dischargers to develop and implement an adequate written MRP by October 1, 1992 or when their industrial activities begin. The MRP must be sufficient to: (a) ensure that stormwater discharges are in compliance with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations specified in the Industrial Stormwater Permit, (b) ensure practices at the facilities to reduce or prevent pollutants in stormwater discharges and authorized non-stormwater discharges are evaluated and revised to meet changing conditions, (c) aid in the implementation and revision of the SWPPP as required by the Industrial Stormwater Permit, and (d) measure the effectiveness of BMPs to prevent or reduce pollutants in stormwater discharges and authorized non-stormwater discharges. Section B: MRP Requirements, ¶ 2. All dischargers must fully implement their MRP. Section B: MRP Requirements, ¶ 1. All dischargers must submit a certified Annual Report documenting monitoring activity. Section B: MRP Requirements, ¶ 14. In addition, Section C: Standard Provisions, ¶¶ 9 and 10, of the Industrial Stormwater Permit require dischargers to certify, based on annual site inspection, that the permitted facilities are in compliance with the Permit and to report any noncompliance with its terms.[12] As described below, however, You have not adopted or have not fully implemented an adequate MRP, have failed to provide complete and accurate Annual Reports, and have failed to provide accurate reporting of noncompliance with the terms of the Industrial Stormwater Permit.

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[12] The July 1, 2015 version of this permit contains updated Monitoring requirements. *See* 2015 Permit § XI. ERF hereby places you on notice that ERF intends to bring claims against you for violations of these provisions in the July 1, 2015 version of the Industrial Stormwater Permit to the extent that You continue Your present stormwater discharge practices in the future as Your present practices do not include monitoring efforts commensurate with the 2015 Permit's requirements.

Your MRP must provide for collection of stormwater samples from the first hour of discharge from (1) the first storm event of the wet season, and (2) at least one other storm event in the wet season, and analysis of such samples. Section B: MRP Requirements ¶ 5. Your MRP must further direct You to take and analyze samples from each discharge point at Your Facility. *Id.* at ¶¶ 5, 7.a. Your MRPs do mandate that You take and separately analyze samples from each discharge point at Your Facility during the stormwater discharge events you monitor. SWPPP 516 A ¶ 5.4; SWPPP 516 B ¶ 5.4.

Your Annual Report submitted to the Regional Board for the Facility indicate that You have not consistently and/or properly taken and analyzed the required samples. Your MRP must provide for visual monitoring and recording of stormwater discharge from one rainfall event per month during the October 1 to May 30 wet season. Section B: MRP Requirements, ¶¶ 3, 4 and 7 (visual observation of stored or contained stormwater must be made during release). Your Annual Report submitted to the Regional Board for the Facility indicate that You have not made and recorded at least one visual observation of all points of discharge of stormwater from Your Facility during at least one rainfall event per month from October 1 to May 30. There were several months in this time period during which You had stormwater discharges from self-reported and unreported discharge points but failed to monitor stormwater discharges and record the results of this monitoring. Specifically, You failed to make the required visual observations of storms on April 1 and 2, 2014.

Your MRP must provide for analysis of stormwater samples for TSS, pH, specific conductance, and total organic carbon ("TOC") or oil and grease. In addition, Your MRP must provide for analysis of stormwater samples for the other analytical parameters listed in the Industrial Stormwater Permit under Table D. You indicate that Your SIC code is 5093, which would obligate You under Table D to analyze stormwater samples for iron, lead, aluminum, copper, zinc, and COD. In addition, Your MRP must provide for analysis of toxic chemicals and other pollutants that are likely to be present in Your stormwater discharges. Industrial Stormwater Permit, Section B: MRP Requirements, ¶ 5. Sampling conducted by ERF has shown that Your stormwater discharges, in addition to these aforementioned pollutants, contain elevated arsenic, chromium, mercury, nickel and selenium, and biochemical oxygen demand (BOD). Any party operating in Your industry doing their due diligence would know that stormwater from a Facility such as Yours would have high COD. Your MRP is inadequate because it fails to provide for analysis of COD.

You have failed to implement Your MRP and/or an MRP that would be compliant with the Stormwater Industrial Permit because you have not analyzed all of the pollutant parameters listed in the above paragraph in each of the stormwater runoff events from Your Facility that You were required to take samples of.

Based on the above, You have not developed and implemented an adequate MRP. You were required to have prepared and implemented an adequate MRP by no later than October 1, 1992 pursuant to the previous Industrial Stormwater Permit issued by the State Board or

by the date industrial activities began according to Section B: Monitoring Program and Reporting Requirements, ¶ 1.a. of the current Industrial Stormwater Permit. Therefore, You have been in daily and continuous violation of the monitoring and reporting requirements of the Industrial Stormwater Permit set forth in Section B: MRP Requirements every day since October 1, 1992. You will continue to be in violation every day that You fail to develop and implement an adequate MRP for the Facility. You are subject to penalties for violations of the Industrial Stormwater Permit and the CWA occurring within the past five (5) years.

As further discussed above, You have not submitted accurate and complete Annual Reports and reports of Your noncompliance with the Industrial Stormwater Permit. Therefore, You have been in daily and continuous violation of the reporting requirements of the Industrial Stormwater Permit, Section B: MRP Requirements, ¶ 14 and Section C: Standard Provisions, ¶¶ 9 and 10 every day since each of Your Annual Reports were due.

IV. PERSONS RESPONSIBLE FOR THE VIOLATIONS

SGS Recycling Enterprises, Inc., A&S Metals, Stanley G. Silva, Jr., and Jeff Vazzolo are the persons responsible for the violations at the Facility described above.

V. NAME AND ADDRESS OF NOTICING PARTY

Our name, address, and telephone number is as follows:

Ecological Rights Foundation
867 B Redwood Drive
Garberville, CA 9542
(707) 923-4372

VI. COUNSEL

ERF has retained legal counsel to represent it in this matter. Please direct all communications to:

Christopher Sproul
Environmental Advocates
5135 Anza Street
San Francisco, CA 94121
(415) 533-3376
Email: csproul@enviroadvocates.com

Fredric Evenson
Ecology Law Center
~Monterey Bay~
P.O. Box 1000
Santa Cruz, CA 95061
(831) 454-8216
Email: evenson@ecologylaw.com

VII. REMEDIES

ERF will seek injunctive and declaratory relief preventing further CWA violations pursuant to CWA sections 505(a) and (d), 33 U.S.C. §1365(a) and (d), and such other relief as permitted by law. In addition, ERF will seek civil penalties pursuant to CWA section 309(d), 33 U.S.C. § 1319(d) and 40 C.F.R. section 19.4, against each defendant in this action of up to $32,500 for all violations on or after March 15, 2004. *See* 69 Fed. Reg. 7121 (Feb. 13, 2004). Lastly, ERF will seek to recover costs and attorneys' fees in accord with CWA section 505(d), 33 U.S.C. § 1365(d).

ERF believes this Notice of Violations and Intent to Sue sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period or thereafter, to file a citizen suit under CWA section 505(a) against You for the above-referenced violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations noted in this letter. If You wish to pursue such discussions in the absence of litigation, we suggest that You initiate those discussions within the next 20 days so that they may be completed before the end of the 60-day notice period. We do not intend to delay the filing of a complaint in federal court if discussions are continuing when that period ends.

Sincerely,

Christopher a Sproul

Christopher Sproul
Environmental Advocates
Counsel for Ecological Rights Foundation

ADDITIONAL SERVICE LIST – FEDERAL & STATE AGENCIES

cc: Gina McCarthy, Administrator U.S. Environmental Protection Agency Ariel Rios Building 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460	Eric Holder, U.S. Attorney General U.S. Department of Justice 950 Pennsylvania Avenue, N.W. Washington, D.C. 20530-0001
Jared Blumenfeld, Regional Administrator U.S. Environmental Protection Agency Region IX 75 Hawthorne Street San Francisco, California 94105	Thomas Howard Executive Director State Water Resources Control Board P.O. Box 100 Sacramento, California 95812-0100
Kenneth A. Harris, Executive Officer Regional Water Quality Control Board Region 3 895 Aerovista Place, Suite 101 San Luis Obispo, CA 93401	

Attachment 1: Sampling Results from A&S Facility

ERF SAMPLING DATA

DATE	POLLUTANT	RESULT	EPA BENCHMARK	TIMES EXCEEDED	CTR (Salt) CMC	TIMES EXCEEDED	BASIN PLAN Table 3-6	TIMES EXCEEDED
12/11/2014	COD	150 mg/L	120 mg/L	1.25				
12/11/2014	BOD (5day)	33 mg/L	30 mg/L	1.10				
12/11/2014	EC	620 uS/cm	200 uS/cm	3.10				
12/11/2014	Ammonia as N	0.29 mg/L	19 mg/L					
12/11/2014	TSS	370 mg/L	100 mg/L	3.70				
12/11/2014	Total Arsenic (As)	19 ug/L	168 ug/L		69 ug/L			
12/11/2014	Total Cadmium (Cd)	2.8 ug/L	15.9 ug/L		42 ug/L		0.2 ug/L	14.00
12/11/2014	Total Chromium (Cr)	160 ug/L					10 ug/L (SHELL)	
12/11/2014	Hexavalent Chromium (Cr)	ND						
12/11/2014	Total Copper (Cu)	340 ug/L	63.6 ug/L	5.35	4.8 ug/L	70.83	10 ug/L	34.00
12/11/2014	Total Iron	65000 ug/L (65 mg/L)	1 mg/L	65.00				
12/11/2014	Total Lead (Pb)	88 ug/L	81.6 ug/L	1.07	210 ug/L		10 ug/L	8.80
12/11/2014	Total Mercury (Hg)	0.75 ug/L	2.4 ug/L				0.1 ug/L	7.50
12/11/2014	Total Nickel (Ni)	200 ug/L	1417 ug/L		74 ug/L		2 ug/L	
12/11/2014	Total Selenium (Se)	4.1 ug/l (.0041 mg/L)	.2385 mg/L					
12/11/2014	Total Silver (Ag)	0.36 ug/L	117 ug/L		1.9 ug/L			

Attachment 2: Alleged Dates of A&S's Violations, March 2010 to March 2015

Days with precipitations of one tenth of an inch or greater, as reported by NOAA's Climatic Data Center, Castroville Station. http://lwf.ncdc.noaa.gov/oa/ncdc.html

Date	Precipitation
3-Mar-10	0.9
4-Mar-10	3.4
9-Mar-10	0.1
10-Mar-10	0.29
13-Mar-10	0.23
5-Apr-10	1.02
12-Apr-10	0.91
13-Apr-10	0.5
20-Apr-10	0.44
21-Apr-10	0.19
26-May-10	0.18
28-May-10	0.16
18-Oct-10	0.2
24-Oct-10	0.31
25-Oct-10	0.21
30-Oct-10	0.11
8-Nov-10	0.37
20-Nov-10	0.42
21-Nov-10	0.61
22-Nov-10	0.1
24-Nov-10	0.27
28-Nov-10	0.4
6-Dec-10	0.28
10-Dec-10	0.12
15-Dec-10	0.17
17-Dec-10	0.13
18-Dec-10	0.36
19-Dec-10	0.45
20-Dec-10	0.31
21-Dec-10	0.12
22-Dec-10	0.29
26-Dec-10	0.62
29-Dec-10	1.1
2-Jan-11	0.84
3-Jan-11	0.2

30-Jan-11	0.25
31-Jan-11	0.15
16-Feb-11	0.6
17-Feb-11	0.15
18-Feb-11	0.97
19-Feb-11	0.52
20-Feb-11	0.38
25-Feb-11	0.49
26-Feb-11	0.31
19-Mar-11	1.07
20-Mar-11	1.05
21-Mar-11	0.55
23-Mar-11	0.4
24-Mar-11	0.7
25-Mar-11	0.53
26-Mar-11	0.52
27-Mar-11	0.51
15-May-11	0.58
17-May-11	0.13
18-May-11	0.22
29-May-11	0.11
4-Jun-11	0.17
29-Jun-11	0.35
4-Oct-11	0.28
5-Oct-11	1.01
6-Oct-11	0.22
7-Oct-11	0.1
4-Nov-11	0.38
6-Nov-11	0.42
12-Nov-11	0.28
20-Nov-11	0.43
21-Nov-11	0.18
21-Jan-12	1.4
23-Jan-12	0.63
14-Feb-12	0.18
1-Mar-12	0.19
17-Mar-12	1
18-Mar-12	0.55
25-Mar-12	0.64
28-Mar-12	0.34
1-Apr-12	0.39
11-Apr-12	0.48
12-Apr-12	0.78

13-Apr-12	0.71
26-Apr-12	0.35
5-Jun-12	0.34
11-Oct-12	0.25
12-Oct-12	0.1
23-Oct-12	0.17
17-Nov-12	0.36
18-Nov-12	0.26
29-Nov-12	0.22
30-Nov-12	0.65
1-Dec-12	1.65
2-Dec-12	0.25
3-Dec-12	0.58
6-Dec-12	0.63
12-Dec-12	0.11
18-Dec-12	0.27
23-Dec-12	0.22
24-Dec-12	0.72
26-Dec-12	0.81
27-Dec-12	0.12
29-Dec-12	0.36
6-Jan-13	0.66
24-Jan-13	0.1
8-Feb-13	0.12
6-Mar-13	0.13
8-Mar-13	0.26
1-Apr-13	0.1
4-Apr-13	0.15
20-Nov-13	0.31
7-Dec-13	0.23
30-Jan-14	0.11
3-Feb-14	0.31
6-Feb-14	0.24
7-Feb-14	0.36
8-Feb-14	0.26
10-Feb-14	0.31
27-Feb-14	0.65
28-Feb-14	1.02
1-Mar-14	0.53
4-Mar-14	0.11
27-Mar-14	0.2
30-Mar-14	0.37
1-Apr-14	0.37

2-Apr-14	0.55
26-Apr-14	0.1
26-Sep-14	0.1
15-Oct-14	0.11
26-Oct-14	0.33
1-Nov-14	1.36
13-Nov-14	0.16
20-Nov-14	0.11
23-Nov-14	0.25
30-Nov-14	0.14
2-Dec-14	0.53
3-Dec-14	0.74
4-Dec-14	0.11
6-Dec-14	0.28
12-Dec-14	4.18
13-Dec-14	0.18
15-Dec-14	0.49
16-Dec-14	1.04
17-Dec-14	0.31
18-Dec-14	0.13
20-Dec-14	0.44
7-Feb-15	0.67
9-Feb-15	0.22
11-Mar-15	0.1